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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V
AMIS INTEGRITY (IMO 9732412) her
engines, freights, apparel, appurtenances,
tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-01671-BR

IN ADMIRALTY

DEFENDANT AMIS INTEGRITY S.A.'S
RESPONSE IN OPPOSITION TO
MOTION TO WITHDRAW AS COUNSEL

Defendant Amis Integrity S.A., through counsel of record, respectfully submits the following Response in Opposition to Motion to Withdraw.

Any stay or withdrawal must be conditioned on compliance with the Court's March 11, 2020 Order requiring Plaintiff to post countersecurity by April 30, 2020. The

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alternative would permit withdrawal or termination of representation to function as a tactic for a further extension in direct conflict with the Court's Order.

Pursuant to LR 83-11(a), withdrawal is a matter of the Court's discretion. As indicated in the Motion, Defendant's primary concern is that any stay or withdrawal not impact the March 11, 2020 Order (Dkt. 75). On February 11, 2020, consistent with Supplemental Admiralty Rule E(7)(a) the Court ordered Plaintiff to post counter security by March 12, 2020, in order to continue prosecution of this arrest action—an arrest Defendant continues to maintain was wrongful and lacking foundation. Dkt. 60. Despite having 30 days to comply (where Defendant had only a few days to post \$2,500,000), Plaintiff sought an extension. The Court allowed an additional 48 days, but clearly stated that no further extensions would be allowed. Dkt. 75. Thus the Court has already afforded Plaintiff over two-and-half months to comply with what is a fundamental obligation for continued prosecution. Rule E(7)(a). Whatever the reasons for the requested withdrawal and stay, it cannot become a tool for non-compliance.

For these reasons, any stay or withdrawal must be conditioned on compliance with the Court's March 11, 2020 Order requiring Plaintiff to post counter security by April 30, 2020.

Respectfully submitted this 10th day of April, 2020.

LE GROS, BUCHANAN & PAUL

By: s/ Markus B.G. Oberg

By: s/ Daniel J. Park

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Attorneys for Defendant Amis Integrity, S.A.

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Anna J. Brown and serve it on all associated counsel.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 10th day of April, 2020.

s/ Shelley Courter

Shelley Courter, Legal Assistant

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